SECTION 7-3, PART B, SAWMILL CHIP HANDLING

OPERATING DATA

PERCENT FUEL CONSUMPTION PER QUARTER

DEC-FEB	25
MAR-MAY	25
JUN-AUG	25
SEP-NOV	25

OPERATING SCHEDULE

HOURS/DAY	16
DAY/WEEK	7
WEEKS/YEAR	52

POLLUTION CONTROL EQUIPMENT

PARAMETER	PRIMARY	SECONDARY
TYPE	Target Box	None
TYPE CODE (FROM APP. A)		
MANUFACTURER	Field Erected	
MODEL NUMBER	na	
PRESSURE DROP (IN. OF WATER)	na	
WET SCRUBBER FLOW (GPM)	na	
BAGHOUSE AIR/CLOTH RATION (FPM)	na	

VENTILATION AND BUILDING/AREA DATA

ENCLOSED (Y/N)?	
HOOD TYPE (FROM APP. B)	
MINIMUM FLOW (ACFM)	
PERCENT CAPTURE EFFICIENCY	
BUILDING HEIGHT (FT)	
BUILDING/AREA LENGTH (FT)	
BUILDING/AREA WIDTH (FT)	

STACK DATA

GROUND ELEVATION (FT)	2,303
UTM X COORDINATE (KM)	518.8
UTM Y COORDINATE (KM)	5,300.8
STACK TYPE (SEE NOTE BELOW)	02
STACK EXIT HEIGHT FROM GROUND LEVEL (FT)	37
STACK EXIT DIAMETER (FT)	1.21
STACK EXIT GAS FLOWRATE (ACFM)	6,000
STACK EXIT TEMPERATURE (DEG. F)	68

AIR POLLUTANT EMISSIONS

POLLUTANT	CAS NUMBER	EMISSION FACTOR (SEE BELOW)	PERCENT CONTROL EFFICIENCY	ESTIMATED OR MEASURED EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (TONS/YR)	REFERENCE
CHIP BIN VENT TARGET BOX							
PM		0.1 lb/ton	na	2.86	2.86	12.54	Idaho DEQ
PM_{10}		0.05 lb/ton	na	1.49	1.49	6.27	Idaho DEQ
CHIP BIN TRUCK LOADOUT							
PM		0.05 lb/ton	50%	1.43	1.43	6.27	Idaho DEQ
PM_{10}		0.025 lb/ton	50%	0.72	0.72	3.13	Idaho DEQ

NOTE: STACK TYPE - 01) DOWNWARD; 02) VERTICAL (UNCOVERED); 03) VERTICAL (COVERED); 04) HORIZONTAL; 05) FUGITIVE

EMISSION FACTOR IN LBS/UNITS. PLEASE USE SAME HOURLY UNITS GIVEN IN FUEL DATA SECTION.

SAWMILL PROCESSES (cont.)

SAWDUST BIN TRUCK LOADOUT

106,144 Tons of Sawdust/Year

TSP:	Emission Factor:	0.05 lbs/ton	Idaho DEQ Factor.
	Emissions:	2.65 tons/year	Sides of loadout blocked from wind, 50% control.
		14.54 lbs/day	
		0.61 lbs/hr	
PM10:	Emission Factor:	0.025 lbs/ton	Idaho DEQ Factor.
	Emissions:	1.33 tons/year	Sides of loadout blocked from wind, 50% control.
		7.27 lbs/day	
		0.30 lbs/hr	

SAWMILL CHIP BIN TRUCK LOADOUT

250,792 Tons of Chips/Year

TSP :	Emission Factor:	0.05 lbs/ton	Idaho DEQ Factor.
	Emissions:	6.27 tons/year	Sides of loadout blocked from wind, 50% control.
		34.36 lbs/day	
		1.43 lbs/hr	
PM10 :	Emission Factor:	0.025 lbs/ton	Idaho DEQ Factor.
	Emissions:	3.13 tons/year	Sides of loadout blocked from wind, 50% control.
		17.18 lbs/day	
		0.72 lbs/hr	

SAWMILL CHIP BIN TARGET BOX

250,792 Tons of Chips/Year

TSP:	Emission Factor:	0.1 lbs/ton	Idaho DEQ Target Box Factor.
	Emissions:	12.54 tons/year	
		68.71 lbs/day	
		2.86 lbs/hr	
PM10:	Emission Factor:	0.05 lbs/ton	Idaho DEQ Target Box Factor.
	Emissions:	6.27 tons/year	
		35.76 lbs/day	
		1.49 lbs/hr	

SAWDUST BIN VENT TARGET BOX

106,144 Tons of Sawdust/Year

TSP:	Emission Factor:	0.1 lbs/ton	Idaho DEQ Target Box Factor.
	Emissions:	5.31 tons/year	
		29.08 lbs/day	
		1.21 lbs/hr	
PM10:	Emission Factor:	0.05 lbs/ton	Idaho DEQ Target Box Factor.
	Emissions:	2.65 tons/year	
		15.12 lbs/day	
		0.63 lbs/hr	

SECTION 7-3: SOLID MATERIAL TRANSPORT, HANDLING, AND STORAGE

DEQ USE ONLY

DEQ PLANT ID CODE		DEQ PROCESS CODE		DEQ STACK ID CODE	
DEQ BUILDING ID CODE		PRIMARY SCC		SECONDARY SCC	
DEQ SEGMENT CODE					

PART A: GENERAL INFORMATION

PROCESS CODE OR DESCRIPTION	Planer Shavings and Chip Handling		
STACK DESCRIPTION	No stacks. Fugitive Only.		
BUILDING DESCRIPTION			
DATE INSTALLED	Sep-04	DATE LAST MODIFIED	NA
MATERIAL DESCRIPTION	Planer shavings and dry chips.		

MATERIAL TRANSFER RATES

MAXIMUM HOURLY TRANSFER RATE (UNITS/HOUR)	unknown	
NORMAL HOURLY TRANSFER RATE (UNITS/HOUR)	na	
NORMAL ANNUAL TRANFER RATE (UNITS/YEAR)	97,500	planer shavings
NORMAL ANNUAL TRANFER RATE (UNITS/YEAR)	48,750	planer chips
UNITS OF MEASURE	tons/year	

BELT CONVEYOR/VEHICLE TRANSFER - None. Shavings and chips are transported pneumatically.

NUMBER OF TRANSFERS		MATERIAL MOISTURE CONTENT (WEIGHT PERCENT)	
MAXIMUM HOURLY WIND SPEED (MPH)			
CONVEYORS ENCLOSED? (Y/N)		CONVEYORS IN BUILDINGS? (Y/N)	
AVERAGE HOURLY WIND SPEED (MPH)			
TRANSFERS ENCLOSED? (Y/N)		TRANSFERS IN BUILDINGS? (Y/N)	

PNEUMATIC CONVEYOR TRANSFERS -- All pneumatic transfer equipment is vented into the planer building.

MATERIAL MOISTURE CONTENT (WEIGHT PERCENT)		PRIMARY SEPARATOR PERCENT EFFICIENCY	
PRIMARY SEPARATOR TYPE		SECONDARY SEPARATOR PERCENT EFFICIENCY	
SECONDARY SEPARATOR TYPE			

MATERIAL STORAGE DATA -- Planer shavings truck bin.

PILE? (Y/N)	N	STORAGE CAPACITY	45 Units	PILE LENGTH (FT)	NA
SILO? (Y/N)	Y	STORAGE CAPACITY UNITS	200 ft^3/unit	PILE WIDTH (FT)	NA
OTHER STORAGE TYPE DESCRIPTION				PILE HEIGHT (FT)	NA

MATERIAL STORAGE DATA -- Planer chip truck bin.

PILE? (Y/N)	N	STORAGE CAPACITY	45 Units	PILE LENGTH (FT)	NA
SILO? (Y/N)	Y	STORAGE CAPACITY UNITS	200 ft^3/unit	PILE WIDTH (FT)	NA
OTHER STORAGE TYPE DESCRIPTION				PILE HEIGHT (FT)	NA

MATERIAL DATA

HAP DESCRIPTION	HAP CAS NUMBER	HAP FRACTION IN MATERIAL BY WEIGHT
NONE		
NONE		
NONE		
NONE		
NONE		
NONE		

SECTION 7-4, PART B, PLANER SHAVINGS AND CHIP HANDLING

OPERATING DATA

PERCENT FUEL CONSUMPTION PER QUARTER

DEC-FEB	25
MAR-MAY	25
JUN-AUG	25
SEP-NOV	25

OPERATING SCHEDULE

HOURS/DAY	16
DAY/WEEK	7
WEEKS/YEAR	52

POLLUTION CONTROL EQUIPMENT

PARAMETER	PRIMARY	SECONDARY
TYPE	Baghouse	
TYPE CODE (FROM APP. A)	018	
MANUFACTURER	Unknown	
MODEL NUMBER	Unknown	
PRESSURE DROP (IN. OF WATER)	na	
WET SCRUBBER FLOW (GPM)	na	
BAGHOUSE AIR/CLOTH RATION (FPM)	na	

VENTILATION AND BUILDING/AREA DATA

ENCLOSED (Y/N)?	
HOOD TYPE (FROM APP. B)	
MINIMUM FLOW (ACFM)	
PERCENT CAPTURE EFFICIENCY	
BUILDING HEIGHT (FT)	
BUILDING/AREA LENGTH (FT)	
BUILDING/AREA WIDTH (FT)	

STACK DATA -- Baghouse is vented into planer building.

GROUND ELEVATION (FT)	
UTM X COORDINATE (KM)	
UTM Y COORDINATE (KM)	
STACK TYPE (SEE NOTE BELOW)	
STACK EXIT HEIGHT FROM GROUND LEVEL (FT)	
STACK EXIT DIAMETER (FT)	
STACK EXIT GAS FLOWRATE (ACFM)	
STACK EXIT TEMPERATURE (DEG. F)	

AIR POLLUTANT EMISSIONS

POLLUTANT	CAS NUMBER	EMISSION FACTOR (SEE BELOW)	PERCENT CONTROL EFFICIENCY	ESTIMATED OR MEASURED EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (TONS/YR)	REFERENCE
PLANER CHIPPER AND SCREEN							
PM		0.1 lb/ton	na	0.56	0.56	2.44	Idaho DEQ
PM_{10}		0.05 lb/ton	na	0.28	0.28	1.22	Idaho DEQ
SHAVINGS BIN TRUCK LOADOUT				(LBS/HR)			
PM		0.05 lb/ton	50%	0.56	0.56	2.44	Idaho DEQ
PM_{10}		0.025 lb/ton	50%	0.28	0.28	1.22	Idaho DEQ
PLANER CHIP BIN TRUCK LOADOUT							
PM		0.05 lb/ton	50%	0.28	0.28	1.22	Idaho DEQ
PM_{10}		0.025 lb/ton	50%	0.14	0.14	0.61	Idaho DEQ

NOTE: STACK TYPE - 01) DOWNWARD; 02) VERTICAL (UNCOVERED); 03) VERTICAL (COVERED); 04) HORIZONTAL; 05) FUGITIVE

EMISSION FACTOR IN LBS/UNITS. PLEASE USE SAME HOURLY UNITS GIVEN IN FUEL DATA SECTION.

PLANER PROCESSES

PLANER, INDOOR

There are no emissions from the planers because they are pneumatically controlled through the shavings transport system.

PLANER CHIPPER AND SCREEN

48,750 Tons of Planer Chips/Year
8760 Hours/Year

TSP :	Emission Factor:	0.1 lbs/ ton	General Material Handling Factor
	Emissions:	2.44 tons/year	
		13.36 lbs/day	
		0.56 lbs/hr	
PM10 :	Emission Factor:	0.05 lbs/ ton	General Material Handling Factor
	Emissions:	1.22 tons/year	
		6.68 lbs/day	
		0.28 lbs/hr	

PLANER CHIP BIN TRUCK LOADOUT

48,750 Tons of Planer Chips/Year

TSP :	Emission Factor:	0.05 lbs/ton	Idaho DEQ Factor.
	Emissions:	1.22 tons/year	Sides of loadout blocked from wind, 50% control.
		6.68 lbs/day	
		0.28 lbs/hr	
PM10 :	Emission Factor:	0.025 lbs/ton	Idaho DEQ Factor.
	Emissions:	0.61 tons/year	Sides of loadout blocked from wind, 50% control.
		3.34 lbs/day	
		0.14 lbs/hr	

PLANER SHAVINGS BIN TRUCK LOADOUT

97,500 Tons of Planer Shavings/Year

TSP :	Emission Factor:	0.05 lbs/ton	Idaho DEQ Factor.
	Emissions:	2.44 tons/year	Sides of loadout blocked from wind, 50% control.
		13.36 lbs/day	
		0.56 lbs/hr	
PM10 :	Emission Factor:	0.025 lbs/ton	Idaho DEQ Factor.
	Emissions:	1.22 tons/year	Sides of loadout blocked from wind, 50% control.
		6.68 lbs/day	
		0.28 lbs/hr	

SECTION 8 - 1: FUGITIVE PAVED ROAD DUST SOURCES

DEQ USE ONLY

DEQ PLANT ID CODE		DEQ PROCESS CODE		DEQ STACK ID CODE	
DEQ BUILDING ID CODE		PRIMARY SCC		SECONDARY SCC	
DEQ SEGMENT CODE					

PART A: GENERAL INFORMATION

ROAD DESCRIPTION: Paved Roads

PAVED? (Y/N): Y

LENGTH (FT): See plot plan.

WIDTH (FT):

BEGINNING COORDINATES		END COORDINATES	
UTM-X (KM)	UTM-Y (KM)	UTM-X (KM)	UTM-Y (KM)
See plot plan.	NA	NA	NA

DATA FOR ALL ROADS - PAVED

VEHICLE DESCRIPTION	NUMBER OF ROUNDTRIPS PER DAY	VEHICLE MILES TRAVELED PER DAY	NUMBER OF DAYS PER YEAR USED	AVERAGE VEHICLE SPEED (MPH)	SURFACE SILT CONTENT (% WEIGHT)
Log Trucks	161	80	260	6	1
Chip Trucks	40	60	260	6	
Shavings Trucks	18	27	260	6	
Sawdust Trucks	14	21	260	6	
Lumber Trucks	70	70	260	6	
Mics. Vehicles, employee	385	192	260	6	

DATA FOR ALL ROADS - PAVED

VEHICLE DESCRIPTION	VEHICLE EMPTY WEIGHT (TONS)	VEHICLE FULL WEIGHT (TONS)
Log Trucks	13	40
Chip Trucks	13	40
Shavings Trucks	13	40
Sawdust Trucks	13	40
Lumber Trucks	13	40
Mics. Vehicles, employee	3	3

ROAD DUST CHEMICALS

HAP DESCRIPTION	HAP CAS NUMBER	HAP FRACTION IN IN ROAD DUST BY WEIGHT
NONE		
NONE		
NONE		
NONE		
NONE		
NONE		

SECTION 8-1, PART B, PAVED ROADS

OPERATING DATA

PERCENT FUEL CONSUMPTION PER QUARTER

DEC-FEB	25
MAR-MAY	25
JUN-AUG	25
SEP-NOV	25

OPERATING SCHEDULE

HOURS/DAY	16
DAY/WEEK	5
WEEKS/YEAR	52

FUGITIVE DUST CONTROL DATA

PARAMETER	PRIMARY	SECONDARY
CONTROL DESCRIPTION	None on paved roads.	
CONTROL CODE (FROM APPENDIX A)		
MINIMUM DAILY APPLICATIONS OF CONTROL		
MAXIMUM DAILY APPLICATIONS OF CONTROL		
AVERAGE ANNUAL APPLICATIONS OF CONTROL		
AMOUNT APPLIED (UNITS/APPLICATION)		
UNITS FOR APPLICATION AMOUNT		

AIR POLLUTANT EMISSIONS

POLLUTANT	CAS NUMBER	EMISSION FACTOR (SEE BELOW)		PERCENT CONTROL EFFICIENCY	ESTIMATED OR MEASURED EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (LBS/HR)	(TONS/YR)	REFERENCE
PM		0.607	lb/VMT	0	11.4	11.4	35.7	AP-42
PM_{10}		0.118	lb/VMT	0	2.22	2.22	6.94	AP-42

NOTE: IN LBS/UNIT, USE UNITS OF VEHICLE MILES TRAVELED (VMT)
EMISSION FACTOR IN LBS/UNITS. PLEASE USE SAME HOURLY UNITS GIVEN IN FUEL DATA SECTION.

Fugitive Dust - PAVED ROADS

Calculations based on AP-42 Section 13.2.1.3, rev. 12/03

Source	Class	Number Trips Per Year	Distance per Trip (miles)	VMT	Avg. Vehicle Weight W	Weighted Vehicle Weight
Log Trucks	Paved, Loaded	41,786	0.25	10447	40	3.56
	Paved, Empty	41,786	0.25	10447	13	1.16
Chip Trucks	Paved, Loaded	10,488	0.50	5244	40	1.79
	Paved, Empty	10,488	1.00	10488	13	1.16
Shavings Trucks	Paved, Loaded	4,779	0.50	2390	40	0.81
	Paved, Empty	4,779	1.00	4779	13	0.53
Sawdust Trucks	Paved, Loaded	3,717	0.50	1859	40	0.63
	Paved, Empty	3,717	1.00	3717	13	0.41
LumberTrucks	Paved, Loaded	18,056	0.50	9028	40	3.08
	Paved, Empty	18,056	0.50	9028	13	1.00
Misc. Vehicles incl employee	Paved	100,000	0.50	50000	3	1.28
		257,652		117,425		15

$E=k(sL/2)^{0.65}(w/3)^{1.5} - C$

	PM	PM10
k =	0.082	0.016
sL=	1	1
W =	15	15
C =	0.00047	0.00047
E=	0.607 lb/VMT	0.118 lb/VMT

Total PM Emissions:	**35.7**	**tpy**
Total PM10 Emissions	**6.94**	**tpy**

SECTION 8 - 2: FUGITIVE UNPAVED ROAD DUST SOURCES

DEQ USE ONLY

DEQ PLANT ID CODE		DEQ PROCESS CODE		DEQ STACK ID CODE	
DEQ BUILDING ID CODE		PRIMARY SCC		SECONDARY SCC	
DEQ SEGMENT CODE					

PART A: GENERAL INFORMATION

ROAD DESCRIPTION: Unpaved Area of Plant Site

PAVED? (Y/N): N

LENGTH (FT): NA

WIDTH (FT): NA

BEGINNING COORDINATES		END COORDINATES	
UTM-X (KM)	UTM-Y (KM)	UTM-X (KM)	UTM-Y (KM)
See Plot Plan	NA	NA	NA

DATA FOR ALL ROADS - UNPAVED

VEHICLE DESCRIPTION	NUMBER OF ROUNDTRIPS PER DAY	VEHICLE MILES TRAVELED PER DAY	NUMBER OF DAYS PER YEAR USED	AVERAGE VEHICLE SPEED (MPH)	SURFACE SILT CONTENT (% WEIGHT)
Log Trucks	162	32	260	6	1.8
Log Loaders	162	32	260	6	
Hog Fuel Trucks	6	2.4	260	6	

DATA FOR ALL ROADS - UNPAVED

DATA: UNPAVED ROADS

VEHICLE DESCRIPTION	VEHICLE EMPTY WEIGHT (TONS)	VEHICLE FULL WEIGHT (TONS)	NUMBER OF WHEELS PER VEHICLE	NUMBER OF DAYS >0.01 INCHES PRECIPITATION
Log Trucks	13	40	18	220
Log Loaders	20	47	4	
Hog Fuel Trucks	5	15	6	

ROAD DUST CHEMICALS

HAP DESCRIPTION	HAP CAS NUMBER	HAP FRACTION IN IN ROAD DUST BY WEIGHT
NONE		
NONE		
NONE		
NONE		
NONE		
NONE		

SECTION 8 - 2, PART B

OPERATING DATA

PERCENT FUEL CONSUMPTION PER QUARTER

DEC-FEB	25
MAR-MAY	25
JUN-AUG	25
SEP-NOV	25

OPERATING SCHEDULE

HOURS/DAY	16
DAY/WEEK	5
WEEKS/YEAR	52

FUGITIVE DUST CONTROL DATA

PARAMETER	PRIMARY	SECONDARY
CONTROL DESCRIPTION	None	
CONTROL CODE (FROM APPENDIX A)		
MINIMUM DAILY APPLICATIONS OF CONTROL		
MAXIMUM DAILY APPLICATIONS OF CONTROL		
AVERAGE ANNUAL APPLICATIONS OF CONTROL		
AMOUNT APPLIED (UNITS/APPLICATION)		
UNITS FOR APPLICATION AMOUNT		

AIR POLLUTANT EMISSIONS

POLLUTANT	CAS NUMBER	EMISSION FACTOR (SEE BELOW)		PERCENT CONTROL EFFICIENCY	ESTIMATED OR MEASURED EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (LBS/HR)	ALLOWABLE EMISSIONS (TONS/YR)	REFERENCE
PM		1.409	lb/VMT	0	4.22	4.22	13.2	AP-42
PM_{10}		0.295	lb/VMT	0	0.88	0.88	2.76	AP-42
LEAD								

NOTE: IN LBS/UNIT, USE UNITS OF VEHICLE MILES TRAVELED (VMT)
EMISSION FACTOR IN LBS/UNITS. PLEASE USE SAME HOURLY UNITS GIVEN IN FUEL DATA SECTION.

Fugitive Dust - UNPAVED ROADS

Calculations based on AP-42 Section 13.2.2, rev. 12/03

Source	Class	Number Trips Per Year	Distance per Trip (miles)	VMT	Avg. Vehicle Weight W	Weighted Vehicle Weight
Log Trucks	Unpaved, Loaded	42,000	0.10	4200	40	9.00
	Unpaved, Empty	42,000	0.10	4200	13	2.92
Log Movers	Unpaved, Loaded	42,000	0.10	4200	47	10.57
	Unpaved, Empty	42,000	0.10	4200	20	4.50
Hog Fuel Trucks	Unpaved, Loaded	4,680	0.20	936	15	0.75
	Unpaved, Empty	4,680	0.20	936	5	0.25
		177,360		18,672		28

$E=k(s/12)^a*(W/3)^b*(365-p)/365$

	PM	PM10
k =	4.9	1.5
a =	0.7	0.9
b =	0.45	0.45
s =	1.8	1.8
W =	28	28
p =	220	220
E=	1.409	0.295
	lb/VMT	lb/VMT

Total PM Emissions:	**13.16**	**tpy**
Total PM10 Emissions	**2.76**	**tpy**

Riley Creek Fire Water Pump

Cummins Diesel
Jocky Pump Controller 3 horsepower
Main Controller 150 horsepower
153 horsepower

Pump keeps fire suppression system charged in the event of a power outage. Tested monthly.

120 Hours of Operation

Testing and during power outages

TSP/ PM10
Emission Factor: 2.20E-03 lb/hp-hr AP-42, Section 3.3, Table 3.3-1
Emissions: 0.26 tons/year
0.34 lb/hr

Sulfur Dioxide:
Emission Factor: 2.05E-03 lb/hp-hr AP-42, Section 3.3, Table 3.3-1
Emissions: 0.25 tons/year
0.31 lb/hr

Nitrogen Oxides (NOx)
Emission Factor: 3.10E-02 lb/hp-hr AP-42, Section 3.3, Table 3.3-1
Emissions: 3.72 tons/year
4.74 lb/hr

Volatile Organic Compounds (VOC) - Total Organic Compounds
Emission Factor: 2.51E-03 lb/hp-hr AP-42, Section 3.3, Table 3.3-1
Emissions: 0.30 tons/year
0.38 lb/hr

Carbon Monoxide (CO)
Emission Factor: 6.68E-03 lb/hp-hr AP-42, Section 3.3, Table 3.3-1
Emissions: 0.80 tons/year
1.02 lb/hr

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
001	TITLE AND SCOPE General Applicability	None Required	NA	X	
002	WRITTEN INTERPRETATIONS General Applicability	None Required	NA	X	
003	ADMINISTRATIVE APPEALS General Applicability	None Required	NA	X	
004	CATCHLINES General Applicability	None Required	NA	X	
005	DEFINITIONS General Applicability	None Required	NA	X	
006	GENERAL DEFINITIONS General Applicability	None Required	NA	X	
007	DEFINITIONS FOR THE PURPOSES OF SECTIONS 200 THROUGH 223 AND 400 THROUGH 461 General Applicability	None Required	NA	X	
008	DEFINITIONS FOR THE PURPOSES OF SECTIONS 300 THROUGH 386 General Applicability	None Required	NA	X	
009	DEFINITIONS FOR THE PURPOSES OF 40 CFR PART 60 General Applicability	None Required	NA	X	
010	DEFINITIONS FOR THE PURPOSES OF 40 CFR PART 61 AND 40 CFR PART 63 General Applicability	None Required	NA	X	
106	ABBREVIATIONS General Applicability	None Required	NA	X	
107	INCORPORATION BY REFERENCE General Applicability	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
121	COMPLIANCE REQUIREMENTS BY DEPARTMENT General Applicability	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
122	INFORMATION ORDERS BY THE DEPARTMENT General Applicability	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
123	CERTIFICATION OF DOCUMENTS General Applicability	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
124	TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS General Applicability	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
125	FALSE STATEMENTS General Applicability	None Required	NA	X	
126	TAMPERING General Applicability	None Required	NA	X	
127	FORMAT OF RESPONSES General Applicability	None Required	NA	X	
128	CONFIDENTIAL INFORMATION General Applicability	None Required	NA	X	
130	STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
131	EXCESS EMISSIONS	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
132	CORRECTION OF CONDITION	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
133	STARTUP, SHUTDOWN AND SCHEDULED MAINTENANCE REQUIREMENTS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
134	UPSET, BREAKDOWN AND SAFETY REQUIREMENTS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
135	EXCESS EMISSIONS REPORTS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
136	EXCESS EMISSIONS RECORDS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
140-149	VARIANCE PROCEDURES AND PETITIONS General Applicability	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
155	CIRCUMVENTION General Applicability	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
156	TOTAL COMPLIANCE General Applicability	None Required	NA	X	
157	TEST METHODS AND PROCEDURES General Applicability	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
160	PROVISIONS GOVERNING SPECIFIC ACTIVITIES AND CONDITIONS General Applicability	None Required	NA	X	
161	TOXIC SUBSTANCES	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
162	MODIFYING PHYSICAL CONDITIONS General Applicability	None Required	NA	X	
163	SOURCE DENSITY General Applicability	None Required	NA	X	
300	PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS General Applicability	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
301	REQUIREMENT TO OBTAIN TIER I OPERATING PERMIT General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
302	OPTIONAL TIER I OPERATING PERMIT General Applicability	None Required	NA	X	
311	STANDARD PERMIT APPLICATIONS General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
312	DUTY TO APPLY General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
313	TIMELY APPLICATION General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
314	REQUIRED STANDARD APPLICATION FORM AND REQUIRED INFORMATION General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
315	DUTY TO SUPPLEMENT OR CORRECT APPLICATION General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
316	EFFECT OF INACCURATE INFORMATION IN APPLICATIONS OR FAILURE TO SUBMIT RELEVANT INFORMATION General Applicability	None Required	NA	X	
317	INSIGNIFICANT ACTIVITIES General Applicability	None Required	NA	X	
321	TIER I OPERATING PERMIT CONTENT General Applicability to Tier I Sources	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
322	STANDARD CONTENTS OF TIER I OPERATING PERMITS General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
325	ADDITIONAL CONTENTS OF TIER I OPERATING PERMITS - PERMIT SHIELD General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
332	EMERGENCY AS AN AFFIRMATIVE DEFENSE REGARDING EXCESS EMISSIONS General Applicability to Tier I Sources	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
335	GENERAL TIER I OPERATING PERMITS AND AUTHORIZATIONS TO OPERATE	None Required	NA	X	
360	STANDARD PROCESSING OF TIER I OPERATING PERMIT APPLICATIONS General Applicability to Tier I Sources	None Required.	NA	X	
361	COMPLETENESS OF APPLICATIONS General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
362	TECHNICAL MEMORANDUMS FOR TIER I OPERATING PERMITS General Applicability	None Required	NA	X	
363	PREPARATION OF DRAFT PERMIT OR DRAFT DENIAL General Applicability	None Required	NA	X	
364	PUBLIC NOTICES, COMMENTS AND HEARINGS General Applicability	None Required	NA	X	
365	PREPARATION OF PROPOSED PERMIT OR PROPOSED DENIAL General Applicability	None Required	NA	X	
366	EPA REVIEW PROCEDURES General Applicability	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
367	ACTION ON APPLICATION General Applicability	None Required	NA	X	
368	EXPIRATION OF PRECEDING PERMITS General Applicability	None Required	NA	X	
369	TIER I OPERATING PERMIT RENEWAL General Applicability to Tier I Sources	None Required	NA	X	
380	CHANGES TO TIER I OPERATING PERMITS General Applicability to Tier I Sources	None Required	NA	X	
381	ADMINISTRATIVE PERMIT AMENDMENTS General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
382	SIGNIFICANT PERMIT MODIFICATION General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
383	MINOR PERMIT MODIFICATION General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
384	SECTION 502(b)(10) CHANGES AND CERTAIN EMISSION TRADES General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
385	OF-PERMIT CHANGES AND NOTICES General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
386	REOPENING FOR CAUSE General Applicability to Tier I Sources	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
440	REQUIREMENTS FOR ALTERNATIVE EMISSION LIMITS (BUBBLES)	None Required	NA	X	
441	DEMONSTRATION OF AMBIENT EQUIVALENCE	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
460	REQUIREMENTS FOR EMISSION REDUCTION CREDIT	None Required	NA	X	
461	REQUIREMENTS FOR BANKING EMISSION REDUCTION CREDITS (ERCs)	None Required	NA	X	
510	STACK HEIGHTS AND DISPERSION TECHNIQUES	None Required	NA	X	
511	APPLICABILITY	None Required	NA	X	
512	DEFINITIONS	None Required	NA	X	
513	REQUIREMENTS	None Required	NA	X	
515	APPROVAL OF FIELD STUDIES AND FLUID MODELS	None Required	NA	X	
516	NO RESTRICTION ON ACTUAL STACK HEIGHT	None Required	NA	X	
525	REGISTRATION AND REGISTRATION FEES	None Required	NA	X	
526	APPLICABILITY	None Required	NA	X	
527	REGISTRATION	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
528	REQUEST FOR INFORMATION	None Required	NA	X	
530	REGISTRATION FEE	Paid according to requirements.	NA	X	
531	REGISTRATION BY THE DEPARTMENT	Information provided as requested.	NA	X	
532	PAYMENT DUE	Paid according to requirements.	NA	X	
533	EFFECT OF DELINQUENCY ON APPLICATIONS	Paid according to requirements.	NA	X	
534	APPEALS	None Required	NA	X	
535	AMENDING REGISTRATION	Paid according to requirements.	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
536	CHECKS SHOULD BE MADE OUT TO "DEPARTMENT OF HEALTH AND WELFARE - AQ REGISTRATION FEE"	Paid according to requirements.	NA	X	
538	LUMP SUM PAYMENTS OF REGISTRATION FEES	Paid according to requirements.	NA	X	
550	AIR POLLUTION EMERGENCY RULE	Information provided as requested.	NA	X	
561	GENERAL RULES	Information provided as requested.	NA	X	
562	SPECIFIC EMERGENCY EPISODE ABATEMENT PLANS FOR POINT SOURCES	Information provided as requested.	NA	X	
575	AIR QUALITY STANDARDS AND AREA CLASSIFICATION	Information/reporting provided as requested.	NA	X	
576	GENERAL PROVISIONS FOR AMBIENT AIR QUALITY STANDARDS	Information/reporting provided as requested.	NA	X	
577	AMBIENT AIR QUALITY STANDARDS FOR SPECIFIC AIR POLLUTANTS	Information provided as requested.	NA	X	
587	LISTING OR DELISTING TOXIC AIR POLLUTANT INCREMENTS	None Required	NA	X	
591	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
600	RULES FOR CONTROL OF OPEN BURNING	None Required	NA	X	
601	FIRE PERMITS, HAZARDOUS MATERIALS AND LIABILITY	None Required	NA	X	
602	NONPREEMPTION OF OTHER JURISDICTIONS	None Required	NA	X	
603	GENERAL RESTRICTIONS	None Required	NA	X	
608	WEED CONTROL FIRES	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
625	VISIBLE EMISSIONS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
650	RULES FOR CONTROL OF FUGITIVE DUST	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
651	GENERAL RULES	None Required	NA	X	
675	FUEL BURNING EQUIPMENT - PARTICULATE MATTER	Recordkeeping and reporting will constitute on-going compliance.	Hog Fuel Boilers	X	
677	STANDARDS FOR MINOR SOURCES AND EXISTING SOURCES	Recordkeeping and reporting will constitute on-going compliance.	Hog Fuel Boilers	X	
678	COMBINATION OF FUELS	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
679	AVERAGING PERIOD	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
680	ALTITUDE CORRECTION	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
681	TEST METHODS AND PROCEDURES General Applicability	Permit application, recordkeeping and reporting will constitute on-going compliance.	NA	X	
700	PARTICULATE MATTER - PROCESS WEIGHT LIMITATIONS	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
701	PARTICULATE MATTER - NEW EQUIPMENT PROCESS WEIGHT LIMITATIONS	Recordkeeping and reporting will constitute on-going compliance.	NA	X	
702	PARTICULATE MATTER - EXISTING EQUIPMENT PROCESS WEIGHT LIMITATIONS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
703	PARTICULATE MATTER - OTHER PROCESSES	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
726	DEFINITIONS AS USED IN SECTIONS 727 THROUGH 729	None Required	NA	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under IDAPA 58.01.01	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Emission Unit Affected	Compliance Yes or No	
728	DISTILLATE FUEL OIL	None Required	NA	X	
775	RULES FOR CONTROL OF ODORS	None Required	NA	X	
776	GENERAL RULES	None Required	NA	X	
785	RULES FOR CONTROL OF INCINERATORS	None Required	NA	X	
786	EMISSION LIMITS	None Required	NA	X	
787	EXCEPTIONS	None Required	NA	X	
808	FUGITIVE DUST CONTROL	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	

APPLICABILITY CHECKLIST, IDAHO REGULATIONS

Citation Under Federal Regulations	Title, Description of Requirements or Standards, and Other Information Necessary to Determine Applicability, Implement or Enforce Requirements	Compliance Determination Method (Recordkeeping, Monitoring, Reporting, Test Method)	Affected Emission Unit	Compliance Yes or No	
40 CFR Part 50	NATIONAL PRIMARY AND SECONDARY AMBIENT AIR QUALITY STANDARDS	Recordkeeping and reporting will constitute on-going compliance.	Plant-wide	X	
40 CFR Part 64	COMPLIANCE ASSURANCE MONITORING (CAM)	Required Compliance Assurance Monitoring Plan to be Submitted with Tier I Application.	Hog Fuel Boiler	X	

REQUEST FOR DETERMINATION OF NONAPPLICABILITY

Riley Creek – Chilco Sawmill seeks a determination of non-applicability for New Source Performance Standards (NSPS) Subpart Db, Standards for Industrial-Commercial-Institutional Steam Generating Units. Riley Creek's hog-fuel boiler was originally built in 1977 and has not been modified or reconstructed, per NSPS definitions, since June 19, 1984 which is the trigger date for NSPS Subpart Db.

Compliance Description

Riley Creek – Chilco Sawmill provides the following statements, as required in IDAPA 58.01.01.314(10)(a).

i. For each applicable requirement with which the emission unit(s) is in compliance, the emissions unit(s) will continue to comply with the applicable requirements.

ii. For each applicable requirement that will become effective during the term of the Tier I operating permit that does not contain a more detailed schedule, the emissions unit(s) will meet the applicable requirement on a timely basis.

iii. For each applicable requirement that will become effective during the term of the Tier I operating permit that contains a more detailed schedule, the emissions unit(s) will comply with the applicable requirement on the schedule provided in the applicable requirement.

iv. Riley Creek is not aware of any applicable requirement with which any emission unit is not in compliance at the time of this application submittal.

CAM PLAN FOR ELECTRIFIED FILTER BED (EFB) FOR PM

1. APPLICABILITY

1.1 Control Technology: Electrified filter bed (EFB) [079]

1.2 Pollutants
Primary: Particulate matter (PM)
Other: Particulate matter smaller than 10 microns (PM_{10})

1.3 Process/Emission unit: Hog Fuel Boiler

2. MONITORING APPROACH DESCRIPTION

2.1 Parameters to be Monitored: Ionizer current, filter bed voltage, and filter bed temperature.

2.2 Rationale for Monitoring approach:

- Ionizer current: The current on the ionizer provides an indicator of the voltage. A decrease in current could indicate a malfunction, such as a buildup of PM or condensed hydrocarbons on the ionizer.
- Filter bed voltage: The voltage on the gravel must be maintained so charged PM are attracted to the gravel. A decrease in voltage could indicate a malfunction, such as a short or a buildup of PM or condensed hydrocarbons on the gravel.
- Filter bed temperature: An EFB is designed to operate within a relatively narrow temperature operating range. The temperature inside the unit should remain above the dew point of the gas stream being treated because condensation within the system could result in an electrical short in the gravel bed.

Riley Creek will establish indicator ranges for each parameter. A reading outside the range would indicate a need for corrective action but not necessarily an emissions event. The indicator ranges will be available for review at the mill. Riley Creek may adjust the ranges as they gain additional experience with the CAM monitoring plan.

2.3 Monitoring Location

- Ionizer current: Measure current to ionizer electrode (after ionizer).
- Filter bed voltage: Measure voltage of filter bed electrode (after ionizer).
- Filter bed temperature: Measure at the outlet of the filter bed.

2.4 Analytical Devices Required

- Ionizer current: Ammeter
- Filter bed voltage: Voltmeter
- Filter bed temperature: Thermocouple, RTD, or other temperature sensing device.

2.5 Data Acquisition and Measurement System Operation

- Frequency of measurement: Hourly reading by boiler operators. Compliance with the CAM plan will be based on completion of 20 out of 24 hourly readings in every day.
- Reporting units:
  - Ionizer current: Milliamps
  - Filter bed voltage: Kilovolts
  - Filter bed temperature: Degrees Fahrenheit
- Recording process: Operators log data manually.

2.6 Data Requirements

- Baseline ionizer current, filter bed voltage, and filter bed temperature measurements concurrent with emissions test.
- Historical plant records of ionizer current, filter bed voltage, and filter bed temperature measurements.

2.7 Specific QA/QC Procedures: Calibrate, maintain, and operate instrumentation using procedures that take into account manufacturer's specifications.

REFERENCES:

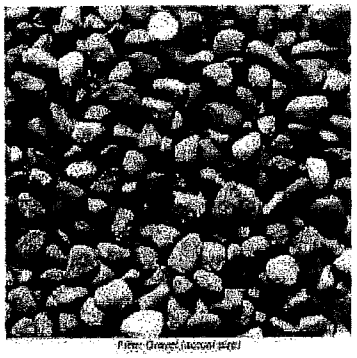
CAM Technical Guidance Document, Appendix B, CAM Illustrations, Revision 1, Review Draft, January 2005. (http://www.epa.gov/ttnemc01/cam).

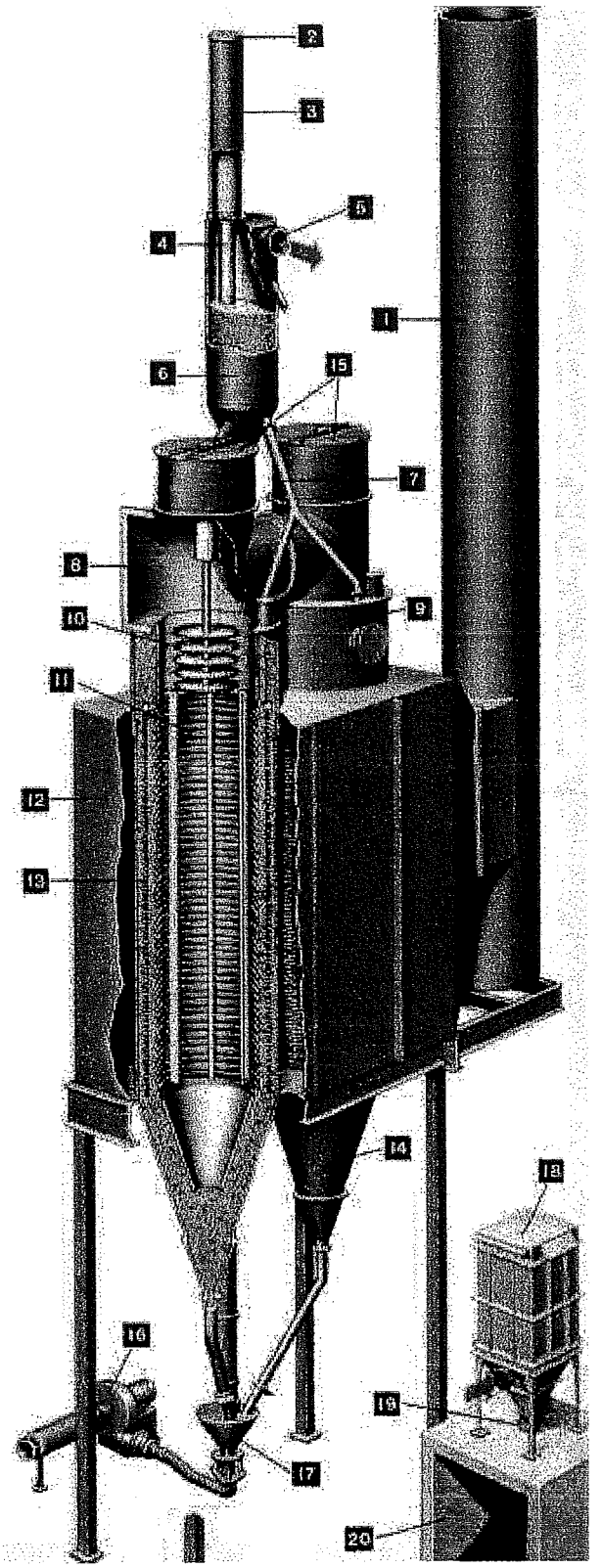
EFB INC.
PARTICULATE CONTROL SYSTEMS

After collection of particulate matter in the gravel bed, the gravel is continuously cleaned in a pneumatic system developed specifically for the EFB system. At the same time the cleaned gravel is transported to the top of the system to be used again in the filter.

Collected dust is conveyed in dry, low pressure, low temperature air to a silo or bunker equipped with a small dust collector. This can be located practically anywhere in the plant, usually where other waste materials are deposited. No other conveying systems are needed.

1. **Stack –**
2. **Bounce Pad –**
3. **Disengagement Chamber –**
4. **Lift Pipe –**
5. **Dust Outlet –**
6. **Surge Hopper –**
7. **Downcomer Pipes –**
8. **Gas Inlet –**
9. **Upper Hopper –**
10. **Ionizer –**
11. **Inner Louvers –**
12. **Casing –**
13. **Bed Electrode –**
14. **Conical Hopper –**
15. **Multiple Filter Modules –**
16. **Lift Air Blower –**
17. **Gravel Feeder –**
18. **Dust Collector –**
19. **Rotary Aitlock –**
20. **Dust Bunker –**





EFB Inc. P.O.Box 116 Newton Center, Ma 02459 USA . Tel (617) 969-3698 Fax (617) 969-3908 E-mail

STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

COPY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

September 1, 2005

Certified Mail No. 7005 0390 0003 2967 8496

Marc Brinkmeyer, President
Chilco Lake Lumber Co.
dba Riley Creek – Chilco Sawmill
4447 E. Chilco Road
Athol, ID 83801

RE: Facility ID No. 055-00024, Riley Creek – Chilco Sawmill, Athol
Final Permit to Construct No. P-050116

Dear Mr. Brinkmeyer:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050116 for Riley Creek's – Chilco Sawmill in Athol, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately.

The performance test conducted March 29, 2005 on the facility's hog fuel boiler satisfies the performance testing requirement of this permit. A subsequent performance test on the hog fuel boiler, pursuant to PTC No. P-050116, is required on or before March 29, 2010.

Riley Creek submitted a PTC processing fee in the amount of $1,000.00 for it Chilco Sawmill on June 9, 2005. Emissions associated with this permitting action do not increase; therefore, DEQ will refund the processing fee. The processing fee will be sent to Riley Creek at the above address from DEQ's Fiscal Office.

This permit does not release Riley Creek's – Chilco Sawmill from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Coeur d'Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd Permit No. P-050116

Enclosures

G:\Air Quality\Stationary Source\SS Ltd\PTC\Chilco Lake Lumber - Riley Creek P-050116\Final\P-050116 Final PL.doc

c: Tom Harman, Coeur d'Alene, Regional Office
Bill Rogers, Permit Coordinator
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Dave Sande, Fiscal Office
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)

	Air Quality **PERMIT TO CONSTRUCT** **State of Idaho** **Department of Environmental Quality**	**PERMIT No.:** P-050116 **FACILITY ID No.:** 055-00024 **AQCR:** 062 **CLASS:** A **SIC:** 2421 **ZONE:** 11 **UTM COORDINATE (km):** 519.0, 5301.0

1. **PERMITTEE**
   Chilco Lake Lumber Company, LLC – dba Riley Creek – Chilco Sawmill

2. **PROJECT**
   Permit to Construct Modification – See Permit Scope

3. **MAILING ADDRESS**	**CITY**	**STATE**	**ZIP**
4447 E. Chilco Road	Athol	ID	83801

4. **FACILITY CONTACT**	**TITLE**	**TELEPHONE**
Marc Brinkmeyer	President	(208) 263-7574

5. **RESPONSIBLE OFFICIAL**	**TITLE**	**TELEPHONE**
Marc Brinkmeyer	President	(208) 263-7574

6. **EXACT PLANT LOCATION**	**COUNTY**
SE1/4, Section 7, Township 52 North, Range 3 West	Kootenai

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
   Sawmill

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho,* IDAPA 58.01.01.200, et seq.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: September 1, 2005

Table of Contents

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
BDT	Bone Dry Tons
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EFB	Electrified Filter Bed
ft^2	square feet
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb	pound
lb/hr	pound per hour
Mbdft	thousand board feet
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standards
NO_X	nitrogen oxides
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PSD	Prevention of Significant Deterioration
SIC	Standard Industrial Classification
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This permit to construct (PTC) is a modification to the facility's existing PTC. Riley Creek proposes the following changes to its Chilco Sawmill:

- Increase the annual CO emissions limit and the annual steam production limit for the hog fuel boiler.
- Remove all conditions related to the natural gas backup boiler. Riley Creek has decided to not construct this source.
- Remove all conditions related to the planer shavings baghouse and planer chip bin target box. Riley Creek has vented these two sources into the interior of the planer mill building to maintain building pressure and capture energy for building heat.
- Add the hog fuel cyclone to the permit as a new source.

1.2 This PTC replaces PTC No. P-040100, issued August 20, 2004, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Hog Fuel Boiler Manufacturer: Kipper & Sons, #1018 Rated Heat Input Capacity: 125 MMBtu/hr Burner Type: Spreader Stoker Rated Steam Capacity: 75,000 lb/hr	Multiclone Electrified Filter Bed (EFB) Fine Dust Collector
3	EFB Baghouse	None
4	Kilns	None
5	Sawdust Bin Target Box	None
5	Sawmill Chip Bin Target Box	None
6	Hog Fuel Cyclone	Filter bags

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for the Control of Open Burning,*

Performance Testing

2.11 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

Monitoring and Recordkeeping

2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

2.13 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Air Quality Division
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422 Fax: (208) 769-1404

Planer Shavings Cyclone Baghouse Stack and Planer Chip Target Box Vent

2.14 The planer shaving cyclone baghouse stack and the planer chip target box vent shall be routed, configured, or similar to the interior of the planer mill building such that any emissions are not released to the atmosphere.

3. HOG FUEL BOILER

3.1 Process Description

The hog fuel boiler provides steam to heat the facility's dry kilns and the facility's production buildings. The hog fuel boiler is rated at 75,000 pounds steam per hour, but is limited to 69,360 pounds steam per hour as averaged over any consecutive 24-hour period.

3.2 Emissions Control Description

Emissions resulting from the combustion of hog fuel in the hog fuel boiler are first routed to a high efficiency multiclone. The multiclone is the primary PM emission control device. Ash and partially combusted wood fiber removed by the multiclone are then segregated by a classifier. From the classifier, partially combusted wood fiber is reintroduced back into the boiler firebox, and the ash is removed for disposal. After the multiclone, the uncollected fine dust and smoke particles are collected in an electrified filter bed (EFB) dust collector. The cleaned air stream is vented through the Boiler/EFB stack. When the EFB dust collector is cleaned, the dust-laden air stream is vented to the EFB baghouse. Emissions exiting the EFB baghouse exit to the atmosphere through the EFB baghouse vent.

TABLE 3.1 HOG FUEL BOILER AND EFB DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Hog fuel boiler	Multiclone in series with EFB	Boiler/EFB stack
EFB dust collector	EFB baghouse	EFB baghouse vent

Emissions Limits

3.3 The PM_{10}, and CO emissions from the Boiler/EFB stack, and the PM_{10} emissions from the EFB baghouse vent, shall not exceed any corresponding emissions rate limits listed in Table 3.2.

TABLE 3.2 BOILER/EFB STACK AND EFB BAGHOUSE STACK EMISSIONS LIMITS

Source Description	PM_{10}		CO
	lb/hr	T/yr	T/yr
Boiler/EFB stack	6.93	30.4	246.08
EFB baghouse vent	0.23	1.0	

3.4 The CO emissions from the Boiler/EFB stack shall not exceed 0.81 lb CO/1,000 lb steam produced.

3.5 In accordance with IDAPA 58.01.01.210.12.d, formaldehyde emissions from the Boiler/EFB stack shall not exceed 2.41 T/yr.

3.6 In accordance with IDAPA 58.01.01.676, PM emissions from the Boiler/EFB stack shall not exceed 0.08 gr/dscf corrected to 8% oxygen when burning wood products.

3.7 The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

Operating Requirements

3.8 Steam Production Limit

The steam production rate of the hog fuel boiler shall not exceed 69,360 pounds steam per hour averaged over any consecutive 24-hour period.

3.9 Control Equipment Usage

- The EFB and EFB baghouse shall be operated during operation of the hog fuel boiler.
- The permittee shall install, calibrate, maintain, and operate a pressure drop monitoring device to continuously measure the pressure differential across the EFB baghouse.
- The pressure drop across the EFB baghouse shall remain within manufacturer specifications and recommendations. This pressure drop range shall be made available to DEQ representatives upon request.

3.10 Carbon Monoxide Performance Tests

3.10.1 Within 60 days of achieving the maximum production rate, but not later than 180 days after issuance of this permit, the permittee shall conduct a performance test to measure CO emissions from the hog fuel boiler to demonstrate compliance with Permit Condition 3.4. The performance test shall be conducted in accordance with Permit Condition 2.11. The results of the performance test shall be expressed in terms of pounds of CO emitted per 1,000 pounds of steam produced (lb CO/1,000 lb steam).

3.10.2 Subsequent performance tests shall be conducted according to the following schedule:

- If the CO emissions measured during the performance test are less than or equal to 75% of the CO emissions limit listed in Permit Condition 3.4, a subsequent performance test shall be conducted within five years of the test date.
- If the CO emissions measured during the performance test are greater than 75%, but less than or equal to 90% of the CO emissions limit listed in Permit Condition 3.4, a subsequent performance test shall be conducted within two years of the test date.
- If the CO emissions measured during the performance test are greater than 90% of the CO emissions limit listed in Permit Condition 3.4, a subsequent performance test shall be conducted within 12 months of the test date.

Monitoring and Recordkeeping Requirements

3.11 Steam Production Monitoring

The permittee shall monitor and record the average hourly steam production rate over any consecutive 24-hour period to demonstrate compliance with Permit Condition 3.8. This information shall be maintained in accordance with Permit Condition 2.12.

3.12 Pressure Drop Monitoring

The permittee shall monitor and record the pressure drop across the EFB baghouse once per week while the EFB baghouse is operating. This information shall be maintained in accordance with Permit Condition 2.12.

3.13 Visible Emissions Monitoring

The permittee shall monitor and record visible emissions in accordance with Permit Condition 2.8.